

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Fengwei Shu)	
)	
Plaintiff,)	Case No.: 2:24-cv-01643-CB
v.)	
)	Dist. Judge Cathy Bissoon
Grand Di, et al.,)	
)	
Defendants.)	

Defendant's Motion to Compel Notice

NOW COME certain defendants¹ (“Defendants”), by and through their undersigned counsel, and hereby request this Court compel Plaintiff to inform third-parties Amazon.com (“Amazon”) and Walmart.com (“Walmart”), in light of the expiration of the temporary restraining order, that certain restraints imposed thereby should be released.

1. On January 3, 2025, the Court entered a temporary restraining order against Defendants. [Dkt. 11].
2. The TRO was not extended through the pendency of the parties’ briefing on Plaintiff’s preliminary injunction motion, and has since expired pursuant to Fed. R. Civ. P. 65(b)(2).
3. On February 7, 2025 Defendant requested that Plaintiff inform Amazon and Walmart of the expired TRO so that the restraints therein against Defendant’s Amazon and Walmart accounts may be lifted. **Exhibit 1.**
4. The same day, Plaintiff refused to notify the platforms. **Exhibit 2.**

¹ Ahern Li, Alvin Luo, Anroop, Antique Guyue, Belicious Helper, BESTOYARD, Carter Zhang, Covenant of Nauru, dianzi xingyuan, Feliciou, Feperig, gansh, GentleFang, Grand Di, hanyim electronic, Herlloy, hongheyi, Ibuywill 0, Jagogh Yson, JIEYIZEN, Joan Yue, Lanege, Liguabao, Liunmiao, maggie Song, Merkowski, Mingsyu, minlixin, MLINS, Nasiratoon, Qiysamall, R.Homing, Rushijin, Sanlugu, Shannoy, ShanXiPengXiao, Star Aier, The taste of cooking, Theo Lian, Ulthilift, Uwitstar, Veronic, WChiho Q, Weiweiguan, Yjiayi

5. On strong information and belief, and in undersigned counsel's experience in Schedule A e-commerce cases, platforms such as Amazon and Walmart will not lift restraints imposed by a TRO or preliminary injunction, even where such orders expire or are dissolved, absent correspondence from the plaintiff's counsel or order of the court.
6. Here, Defendants Stores and their assets have been restrained since on or about January 3, 2025 [Dkt. 11]. The zombie asset restraint currently in place substantially hinders Defendants' liquidity and ability to continue their operations, and Defendants are in urgent need to access the funds to continue their business. *See, Win Win Aviation, Inc. v. Richland Cnty., S.C. Sheriff's Dep't*, 2015 WL 1197534 at *4 (N.D. Ill. Mar. 16, 2015) ("if plaintiff's business was no longer able to continue as a result ... that would qualify as irreparable harm."); *See also, Am. Trucking Associations, Inc. v. City of Los Angeles*, 559 F.3d 1046 (9th Cir. 2009) (finding irreparable harm here "it is likely that all of that part of the carrier's business will evaporate, even if it does other things elsewhere," and "at the very least[,] a loss of customer goodwill" will result based on inability to transact with customers at the port).

WHEREFORE, Defendants respectfully request this Court to order Plaintiff to specifically inform Amazon and Walmart that, in light of the expiration of the TRO, the restraints on Defendants' respective Amazon and Walmart accounts may be lifted.

Dated this February 19, 2025

Respectfully Submitted,

/s/Adam E. Urbanczyk
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Certificate of Service

I certify that on February 19, 2025, I electronically submitted the foregoing with the Clerk of the Court, which will send notification of such filing to all counsel of record.

Dated: February 19, 2025

/s/Adam E. Urbanczyk

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